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5 *Attorneys for Defendant George Dikian*

6
 7 **UNITED STATES DISTRICT COURT**
 8 **CENTRAL DISTRICT OF CALIFORNIA**

9 VPN.COM LLC,	:	Case No.: 2:2022-cv-04453
	:	
10 Plaintiff,	:	Stipulation to Set Aside Default and re
	:	Deadline to Respond to Complaint
11 vs.	:	
	:	[FRCP 55(c); L.R. 7-1]
12 GEORGE DIKIAN, QAING DU, AND	:	
13 JOHN DOE,	:	
	:	
14 Defendants.	:	
	:	
15	:	
16	:	

17
 18 F.R.C.P. 55(c) provides that the Court may set aside the clerk's entry of default for
 19 good cause. The parties hereby stipulate to excuse the default by Defendant George Dikian,
 20 due to the nature and complexity of the Plaintiff's allegations and newly incoming counsel
 21 for Defendant George Dikian needing extra time to investigate the matter.

22 The parties further hereby stipulate that Defendant George Dikian shall answer or
 23 otherwise respond to Plaintiff's Complaint no later than December 9, 2022. This stipulation
 24 does not alter any Scheduling Order of the Court.
 25
 26

1 IT IS SO STIPULATED.

2 RESPECTFULLY SUBMITTED, December 1, 2022.

3 RODENBAUGH LAW

4 By: 

5 Mike Rodenbaugh

6 *Attorneys for Defendant*

7 *George Dikian*

8 LEWIS & LIN LLC

9 By: /Brett Lewis/

10 Brett Lewis

11 *Attorneys for Plaintiff VPN.com LLC*